

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
CHARLOTTESVILLE DIVISION**

BRENNAN M. GILMORE,

Plaintiff,

v.

ALEXANDER E. (ALEX) JONES, et al.,

Defendants.

No. 3:18-cv-00017-NKM-JCH

**STIPULATION AND [PROPOSED] ORDER**

WHEREAS, Plaintiff Brennan Gilmore (“Gilmore”) sued Defendant Derrick Wilburn (“Wilburn”) for defamation in connection with Wilburn’s authorship of “BOMBSHELL: New evidence suggests Charlottesville was a complete SET-UP” on August 19, 2017;

WHEREAS, Wilburn admits that Gilmore was not involved in a set-up or in any other way with the August 2017 Unite the Right rally in Charlottesville and the terrorist attack that killed Heather Heyer;

WHEREAS, Wilburn does not contest Gilmore’s allegation of defamation;

WHEREAS, the parties desire to amicably resolve all claims arising out of this action;

WHEREAS, in lieu of damages, Wilburn agrees to make a donation of \$2,000 to the Legal Aid Justice Center;

WHEREAS, Gilmore and Wilburn, having entered into a settlement agreement, hereby stipulate to the entry of an order in this action, as follows:

IT IS ORDERED, ADJUDGED, AND DECREED as follows:

1. This Court has jurisdiction over the subject matter of the above action and has personal jurisdiction over the parties for purposes of this action and as set forth in Paragraph 3 below.
2. Wilburn admits that he is liable for the claims asserted by Gilmore in this action.
3. As a condition of settlement, Wilburn has agreed to make a charitable donation of \$2,000 to the Legal Aid Justice Center.
4. The parties agree that this Court will retain jurisdiction to enforce the terms of the parties' settlement agreement and to enforce and resolve any disputes related thereto, if necessary.
5. This action and all defenses thereto are hereby dismissed with prejudice and without costs, disbursements, or attorneys' fees to any party.

/s/ Hassen A. Sayeed  
Jonathan D. Hacker, admitted *pro hac vice*  
Anwar L. Graves, admitted *pro hac vice*  
O'MELVENY & MYERS LLP  
1625 Eye Street, N.W.  
Washington, DC 20006  
Telephone: (202) 383-5300  
Facsimile: (202) 383-5414  
agraves@omm.com  
jhacker@omm.com

/s/ Derrick Wilburn  
Derrick Wilburn, *pro se*

Hassen A. Sayeed, admitted *pro hac vice*  
O'MELVENY & MYERS LLP  
Times Square Tower  
7 Times Square  
New York, New York 10036  
Telephone: (212) 326-2000  
Facsimile: (212) 326-2061  
hsayeed@omm.com

Andrew Mendrala, Virginia Bar No. 82424  
COHEN MILSTEIN SELLERS & TOLL  
PLLC  
1100 New York Avenue N.W., Fifth Floor  
Washington, D.C. 20005  
Telephone: (202) 408-4600  
Facsimile: (202) 408-4699  
amendrala@cohenmilstein.com

Aderson Francois, admitted *pro hac vice*  
CIVIL RIGHTS CLINIC  
GEORGETOWN UNIVERSITY LAW  
CENTER  
600 New Jersey Avenue, N.W.  
Washington, D.C. 20001  
Telephone: (202) 662-9065  
Aderson.Francois@georgetown.edu

Elizabeth B. Wydra, admitted *pro hac vice*  
Brienne J. Gorod, admitted *pro hac vice*  
CONSTITUTIONAL ACCOUNTABILITY  
CENTER  
1200 18th Street, N.W., Suite 501  
Washington, D.C. 20036  
Telephone: (202) 296-6889  
elizabeth@theusconstitution.org  
brienne@theusconstitution.org

*Attorneys for Plaintiff*

**SO ORDERED** this \_\_\_\_ day of \_\_\_\_\_, 2021.

\_\_\_\_\_  
NORMAN K. MOON  
SENIOR UNITED STATES DISTRICT JUDGE